

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2 (c)
DAVIS LAW CENTER, LLC
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Case No: 19-12971

Chapter: 13

Judge: JKS

In Re
JAMES POLITE & CINDY ROOKARD
Debtors

DEBTOR'S OPPOSITION TO CREDITOR'S OBJECTION TO CONFIRMATION

Dear Hon. Judge Sherwood:

As you are aware, this firm represents James Polite & Cindy Rookard (the "Debtors") in this bankruptcy matter. To the extent that Secured Creditor Mr. Cooper hereinafter (the "Creditor") request that Debtor's Application for Loss Mitigation be denied, Debtors respond that under the based on the evidence submitted by Creditor Nationstar Bank, dba Mr. Cooper, there only appears to be two separate loan modification agreements

1. October 1, 2012 agreement See Exhibit A
2. July 2015 agreement See Exhibit B

Debtors contend that since there is only proof of only 2 prior loan modifications, they should be eligible to apply for a third and final loan modification.

Based on the reasons as stated above, Debtors pray that the Court denies Creditors Objection to Confirmation and Loss Mitigation.

Respectfully submitted
Davis Law Center LLC

/s/Robert B. Davis
Robert B. Davis, Esq.
Attorney for Debtors

Dated: April 15, 2019